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*\*Pro hac vice admission to be sought*

*Counsel for Plaintiff and the Putative Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ALEX WOODS, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

VERVE GROUP, INC., a Delaware  
corporation.

Defendant.

Case No.: 5:24-cv-04909-PCP-NMC

**STIPULATED REQUEST FOR ORDER  
CHANGING PLEADING AND CASE  
MANAGEMENT DEADLINES**

1 Pursuant to Civil Local Rule 6-2, Plaintiff Alex Woods (“Plaintiff”) and Defendant Verve  
2 Group, Inc. (“Defendant”), by and through their respective counsel (collectively, “the Parties”),  
3 submit this stipulated request for an order changing pleading and case management deadlines. The  
4 Parties stipulate as follows, subject to Court approval:

5 WHEREAS, Plaintiff served Defendant on August 28, 2024 via Defendant’s registered  
6 agent;

7 WHEREAS, on August 29, 2024, Defendant requested—and Plaintiff agreed to grant—a  
8 forty-five (45) day extension of Defendant’s deadline to move, answer, or otherwise respond to  
9 Plaintiff’s complaint to November 4, 2024;

10 WHEREAS, Defendant alleges that Plaintiff filed this lawsuit against and served the wrong  
11 entity;

12 WHEREAS, the Parties have stipulated, subject to the Court’s approval, to set a deadline of  
13 November 14, 2024 for Plaintiff to file an amended complaint; to set a deadline of December 12,  
14 2024 for Defendant and/or any other defendant(s) named in the amended complaint to answer, move,  
15 or otherwise respond to the Complaint; and to extend all case management deadlines by ten (10)  
16 weeks;

17 WHEREAS, the Parties believe an extension of time would both serve judicial economy and  
18 conserve the resources of the Parties;

19 WHEREAS, the only extension of time sought in this case to date was Defendant’s initial  
20 request for an additional forty-five (45) days to respond to the original complaint;

21 WHEREAS, good cause exists for an extension while the Parties address the issues raised by  
22 Defendant and to allow Plaintiff time to amend his complaint;

23 WHEREAS, Defendant and its counsel are only specially appearing for the limited purpose  
24 of submitting this Stipulation and addressing the issues it has raised regarding its contentions that  
25 Plaintiff filed this lawsuit against and served the wrong entity; and

26 WHEREAS, the Parties enter into this Stipulation without waiving any of their rights, claims  
27 or defenses, including without limitation to any challenge to service, jurisdiction and/or venue.  
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**NOW THEREFORE**, the Parties jointly stipulate and agree, subject to Court approval, to the following dates and deadlines:

<b>Event</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Plaintiff's Deadline to Amend Complaint	N/A	11/14/2024
Defendant's Deadline to Respond to Complaint	11/4/2024	12/12/2024
Parties' Deadline to File ADR Certification	10/24/2024	1/2/2025
Parties' Deadline to File Certification of Conflicts and Interested Entities or Persons	10/24/2024	1/2/2025
Parties' Deadline to Meet and Confer re: Initial Disclosures, Early Settlement, ADR Process Selection, and Discovery Plan.	10/24/2024	1/2/2025
Parties' Deadline to File Joint Case Management Statement	10/31/2024	1/9/2025
Initial Case Management Conference	11/4/2024 at 1:00 PM	1/13/2025 at 1:00 PM
Parties' Deadline to Exchange Initial Disclosures	11/6/2024	1/15/2025

**IT IS SO STIPULATED.**

1 Dated: October 24, 2024

/s/ Jared Lucky

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*Counsel for Plaintiff and the Putative Class*

7 Dated: October 24, 2024

DAVIS+GILBERT LLP

8  
9 /s/ Marc J. Rahman

Marc J. Rachman\*

10 Lead Counsel for Defendant  
11 VERVE GROUP, INC.

12 *\*Pro hac vice admission to be sought*  
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**CERTIFICATION**

I hereby attest that all signatories listed, and on whose behalf this filing is submitted, concur in its content and have authorized its filing.

Dated: October 24, 2024 /s/ \_\_\_\_\_